

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: TRIBUNE COMPANY FRAUDULENT
CONVEYANCE LITIGATION

Consolidated Multidistrict Action
11 MD 2296 (WHP)
12 MC 2296 (WHP)

ECF Case

**DECLARATION OF DAVID C. BOHAN IN SUPPORT OF DEFENDANTS' JOINT
PHASE ONE MOTION TO DISMISS THE INDIVIDUAL CREDITOR ACTIONS WITH
PREJUDICE PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 12(b)(6)**

I, DAVID C. BOHAN, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the law firm Katten Muchin Rosenman LLP and admitted to practice before this Court.

2. Pursuant to this Court's Master Case Order No. 3 (the "Master Case Order"), I am a member of the Executive Committee for the Defendants in the Individual Creditor Actions, as defined by the Master Case Order. I submit this declaration in support of Defendants' Joint Phase One Motion to Dismiss.

3. Attached hereto as Exhibit A is a true and correct copy of the November 7, 2012 Order in *Whyte v. Barclays Bank PLC et al.*, No. 12 Civ. 5318 (JSR) (S.D.N.Y.), Dckt. No. 32.

4. Attached hereto as Exhibit B is a true and correct copy of the transcript of the hearing held October 9, 2012 in *Whyte v. Barclays Bank PLC et al.*, No. 12 Civ. 5318 (JSR) (S.D.N.Y.), Dckt. No. 30.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
February 4, 2013

/s/ David C. Bohan
David C. Bohan

CERTIFICATE OF SERVICE

I, Allison M. Wuertz, an attorney admitted to practice in the State of New York and associated with the law firm of Katten Muchin Rosenman LLP, hereby certify that on February 4, 2013, I caused service of: (i) Reply Memorandum in Further Support of Defendants' Joint Phase One Motion to Dismiss the Individual Creditor Actions with Prejudice Pursuant to Federal Rule of Civil Procedure 12(b)(6); and (ii) the Declaration of David C. Bohan, and the exhibits thereto, made by electronic filing with the Clerk of the Court using the CM/ECF System, which will send a Notice of Electronic Filing to all parties with an e-mail address of record, who have appeared and consent to electronic service in this action.

Dated: February 4, 2013
New York, New York

/s/ Allison M. Wuertz

Allison M. Wuertz